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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

NATALIE DELGADO, individually and on
 behalf of all others similarly situated,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-04181-SI

**JOINT PROPOSED SECOND
 AMENDED CASE SCHEDULE**

Plaintiff Natalie Delgado and Defendant Meta Platforms, Inc. respectfully submit this proposed schedule pursuant to the Court's April 18, 2025 Order. Dkt. 97.

At the April 18, 2025 case management conference, this Court granted Meta's request to file an early summary judgment motion and instructed the Parties to meet and confer regarding a new schedule. Dkt. 97. Having met and conferred, the Parties jointly propose the below schedule.

While the Parties agree to the below proposed schedule, they currently have a dispute concerning the scope of merits discovery relevant to the early summary judgment motion. The Parties anticipate bringing that dispute to the Court's attention shortly. The outcome of that dispute may require further adjustments to the schedule proposed below.

Event	Current Deadline	Proposed New Deadline
Deadline for Completion of Non-Expert Discovery Relevant to Early Summary Judgment Motion Merits Issues	x	September 25, 2025
Deadline for Plaintiff's Service of Expert Report(s), if any, related to Early Summary Judgment Merits Issues	x	October 23, 2025
Deadline for Defendant's Service of Expert Rebuttal Report(s), if any, related to Early Summary Judgment Merits Issues	x	November 20, 2025
Deadline for Plaintiff's Service of Rebuttal Expert Report(s), if any, related to Early Summary Judgment Merits Issues ¹	x	January 5, 2026
Deadline for Completion of Expert Discovery on Early Summary Judgment Merits Issues	x	January 15, 2026

¹ Plaintiff shall be entitled to a rebuttal expert report related to early summary judgment merits issues only to the extent that Defendant's report raises new issues that could not reasonably have been anticipated in Plaintiff's opening report.

Event	Current Deadline	Proposed New Deadline
Deadline for Defendant to File Early Summary Judgment Motion	x	January 29, 2026
Deadline for Plaintiff to Respond to Early Summary Judgment Motion	x	March 5, 2026
Deadline for Meta to File Reply in Support of Early Summary Judgment Motion	x	April 2, 2026
Hearing on Early Summary Judgment Motion	x	April 24, 2026
Plaintiff's Deadline to File: (1) Motion for Class Certification and (2) Expert Reports Related to Class Certification	June 11, 2025	May 7, 2026
Defendant's Deadline to File: (1) Response to Plaintiff's Motion for Class Certification and (2) Expert Reports Related to Class Certification	August 11, 2025	June 11, 2026
Plaintiff's Deadline to File: (1) Reply in Support of Class Certification and (2) Rebuttal Expert Reports Related to Class Certification	September 19, 2025	July 9, 2026
Hearing on Motion for Class Certification	January 23, 2026, at 10:00 am	July 31, 2026

The Parties further advise the Court that the mediation previously scheduled for July 18, 2025 was cancelled in light of the early summary judgment motion. The Parties anticipate rescheduling the mediation to a date in early 2026 after Meta's early summary judgment motion is fully briefed.

A further Case Management Conference is set for September 26, 2025, at 3:00 p.m.

1 Dated: May 9, 2025

LATHAM & WATKINS LLP

2 By: /s/ Gary S. Feinerman
3 Gary S. Feinerman

4 *Attorneys for Meta Platforms, Inc.*

5 Dated: May 9, 2025

GOLDENBERG HELLER & ANTOGNOLI, P.C.

6 By: /s/ Kevin P. Green
7 Kevin P. Green

8 *Attorneys for Plaintiff Natalie Delgado*

9 **CIVIL L.R. 5-1(i)(3) ATTESTATION**

10 Pursuant to Civil Local Rule 5-1(i)(3), I, Gary S. Feinerman, hereby attest under penalty of
11 perjury that concurrence in the filing of this document has been obtained from all signatories.

12
13 Dated: May 9, 2025

LATHAM & WATKINS LLP

14 By: /s/ Gary S. Feinerman
15 Gary S. Feinerman